Montana Fish, Wildlife & Parks

2300 Lake Elmo Drive
Billings MT 59105

February 14, 2000

TO:

Environmental Quality Council
Director's Office, Dept. of Environmental Quality
Montana Fish, Wildlife & Parks

Director's Office	Wildlife Division
Resource Assessment	Design & Construction
Fisheries Division	Legal Unit
Parks Division	Lands Section
Regional Supervisors	

Montana Historical Society, State Preservation Office
Janet Ellis, Montana Audubon Council
Montana Wildlife Federation
Montana State Library
George Ochenski
Commissioner David Simpson
Montana Environmental Information Center
U.S. Fish and Wildlife Service
American Fisheries Society, Montana Chapter
Yellowstone River Parks Association
Magic City Fly Fishers
Federation of Fly Fishers
Walleyes Unlimited, Billings Chapter
Billings Fishing Club
EA Respondents

Ladies and Gentlemen:

Montana Fish, Wildlife and Parks has initiated a management planning process to develop an urban recreational fishery in the Yellowstone River near Billings. Under the proposed alternative, purestrain, native Yellowstone cutthroat trout would be stocked into a 25.1 mile section of the Yellowstone River near Billings in an attempt to establish a put-grow-and-take trout fishery. A draft EA was completed for this proposal on August 13, 1999, and distributed for public comment until September 30, 1999.

The draft EA presented and evaluated two other management alternatives along with this proposed alternative:

Yellowstone

Alternative 2

The "No Action" alternative. No new fisheries management actions would be initiated along this section of the Yellowstone River. This section of the Yellowstone would continue to support a very limited game fish population, and angler use and recreational opportunities would be maintained well below their potential.

Alternative 3

Stocking a different species of gamefish into this section of the Yellowstone River. The EA evaluated the stocking of a native species like channel catfish or sauger to develop a warmwater urban fishery in this section of the Yellowstone River, and the stocking of a nonnative trout species like rainbow trout or brown trout to develop an urban trout fishery.

A total of 16 written comments and 17 calls were received concerning this draft EA. A summary and discussion of each of these comments is enclosed with this Decision Notice.

After careful review and consideration of public comments received, Fish, Wildlife and Parks has decided to proceed with the proposed alternative of stocking native Yellowstone cutthroat trout into the Yellowstone River near Billings to develop an urban recreational fishery.

Intense evaluation of this project over the next five years will determine whether this program is continued into the future.

A final EA, which provides a detailed discussion of the biological considerations behind this decision, is available by calling the Montana Fish, Wildlife and Parks office in Billings at (406)247-2940 or writing to 2300 Lake Elmo Drive, Billings, MT 59105. This final EA contains some minor revisions from the draft EA sent out in August, and includes the summary and discussion of comments.

Sincerely,

Harvey Nyberg
Regional Supervisor

Yellowstone Cutthroat Trout Introduction into the Yellowstone River

PUBLIC COMMENTS

A total of 16 written comments and 17 calls were received concerning this EA. Nine of the written comments supported the plan to stock Yellowstone cutthroat trout into the Yellowstone River near Billings, five were opposed to this plant, and the Montana Council of Trout Unlimited neither supported nor opposed the proposal, but raised a number of issues which will be addressed in this discussion. Thirteen of the 17 phone calls supported the proposal. The other four callers did not specifically support or oppose the proposal, but had other comments relating to the project.

Two general schools of thought emerged from the comments. A majority of the respondents felt this was a good proposal that would increase angling opportunities close to Billings, provide an opportunity to introduce local youths to fishing, and take pressure off other waters in the area. The remainder felt this proposal goes against Montana's wild trout policy, and would undermine Montana's policy of not stocking trout in streams.

The following list summarizes the comments received and shows the number of calls or letters which addressed each comment. This proposal:

1. Will diversify recreational opportunities around Billings. (12)

2. Would be good for local youths; would provide angling opportunity for young anglers; will help keep kids off the streets. (8)

3. Will take fishing pressure off other waters. (5)

4. Will help Yellowstone cutthroat conservation efforts. (2)

5. Is incompatible with Yellowstone cutthroat restoration; providing a recreational fishery does not fit into the overall restoration goal. (1)

6. Will not increase support for native fish. (1)

7. Will not promote stocking in other streams, it is a unique situation. (1)

8. Establishes precedence against Montana's Wild Trout program; will promote stocking in other streams; we don't stock streams. (5)

9. Needs definite criteria to meet for similar projects; why is this project unique? (1)

10. Sounds like maximizing hatchery supplementation, i.e. (1)
"The Fisheries Division of Fish, Wildlife and Parks is charged with protecting and enhancing Montana's fish populations and the habitat upon which they depend, while providing as much recreational opportunities as possible for all anglers."

11. Would be stocking trout into a transition area on the river more (2)
suitable for warmwater fish.

12. Contradicts studies showing that success of stocking catchable or sub- (1)
catchable size trout into rivers is often low.

13. Ignores the need to continue to protect and improve habitat; proposal (4)
lacks a detailed habitat improvement plan.

14. Uses the wrong donor stock for the Yellowstone River; McBride cutthroat (2)
are not genetically compatible with a large river; question genetics

15. Is not a reintroduction or expansion of Yellowstone cutthroat trout into (2)
their historic range, if there is no natural reproduction.

16. Has not addressed the whirling disease issue. (2)

17. Should discuss the cost / benefit to sportsman? (2)

18. Violates Montana's ARM rules on stocking catchable trout. (2)

The following discussion attempts to address issues and concerns raised in these comments:

Comments 1 & 2:
These comments represent the most common responses received on the EA, and are the major premise of the proposed project.

Comment 3:
If a Yellowstone cutthroat fishery is developed in the Yellowstone River near Billings, it would very likely take some pressure off other waters in the surrounding area.

Comments 4, 5, & 6:
This proposal has not been promoted as and is not designed to be part of a conservation or restoration plan for Yellowstone cutthroat trout. The sole purpose of this proposal is to develop an urban fishery and increase recreational opportunities on a section of the Yellowstone River near Billings that currently lacks any significant gamefish population.

The proposed project uses Yellowstone cutthroat trout to establish this fishery because they are

the native trout species that were historically present in this section of the river as well as other reasons listed in the EA. Although this project is not part of a conservation effort toward Yellowstone cutthroat, it could provide support for ongoing conservation efforts in several ways. Part of the primary conservation goal developed for the Yellowstone cutthroat trout includes protection and maintenance of the RECREATIONAL value of the species. To many anglers, part of the recreational value of a fish is being able to take some home to eat. If this proposed project is successful, it will expose many anglers to this important native trout, and will provide one of the few remaining areas where an angler may catch and keep a Yellowstone cutthroat. Having a population of Yellowstone cutthroat present in the river near Billings could help gain public support for habitat enhancement projects or other projects proposed in the future.

Comments 7, 8, & 9:
The single greatest fear expressed against this proposal is that it will set a new precedent and undermine Montana's longstanding wild trout philosophy. Montana's reputation of being the best "wild trout" state in the country was accomplished through a hard-fought philosophy of not stocking hatchery trout over a wild trout population in any stream, and through a clear focus on habitat protection and enhancement to protect and maintain these wild trout fisheries.

This section of the Yellowstone River contains the necessary habitat and conditions to support a trout population, but lacks a source of young fish to develop and maintain a self-sustaining population. As a result, this section of river does not currently support a wild trout population that could be impacted by a hatchery plant. The main factor controlling recruitment of trout to this section of river is a lack of spawning tributaries along this reach of river, and no potential for mainstem spawning. We have begun enhancing small spring creeks entering the Yellowstone River and will continue to pursue similar, feasible projects. Reclaiming larger tributaries will be a slow, difficult and costly process. In the meantime, raising public awareness of this native species may help increase public support for long-term solutions.

Any new proposal to stock trout into a stream would have to undergo the same in-depth environmental review this proposal has undergone. This section of the Yellowstone River is unique in having nearly all of the habitat conditions necessary to support a wild trout fishery, yet not supporting even a marginal wild trout population. It is located near a large population center, so any fishery that is developed through stocking would receive a tremendous amount of use. The controlling factor limiting the development of a wild trout fishery has been identified, and cannot be practically overcome in the near future. Any other stream reaches that meet these criteria would have to be identified and approved through the EA process before they could be planted.

Comment 10:
The following paragraphs are excerpted directly from Fisheries Beyond 2000:

"The central purpose for managing the state's fisheries is to protect, enhance and restore populations of native and nonnative species of fish. Native fish include sport species such as cutthroat trout, bull trout and arctic grayling, as well as nongame species such as sicklefin chubs and sculpins. Examples of nonnative fish include brook trout, rainbow trout, and brown trout.

Pursuing this goal entails a wide variety of activities. Generally speaking, these activities may be classified as monitoring the life cycles of different fish populations in varied habitats, regulating harvest of native and nonnative fish, and devising strategies to maintain sufficiently healthy and genetically diverse fish populations to satisfy the fishing opportunities the public demands.

..... Different waters have different values, and the fishery for which they will be managed will depend on their location, ownership, species historically present, species currently present, and the number and conditions of populations of fish species in surrounding waters. Ultimately, it is the department's goal to restore populations of native fish species with sporting value (e.g. bull trout, cutthroat trout) to levels where angling opportunities can be allowed." Although this project is not proposed as restoration of a Yellowstone cutthroat trout population, it will provide an interim opportunity for anglers to enjoy native Yellowstone cutthroat while wild populations elsewhere are being restored to levels that can support angling.

Perhaps using the term "as much" in the draft EA statement caused a misunderstanding. The Department remains an advocate of wild fisheries and habitat restoration in streams. This reach of the Yellowstone River is unique in that, as historic range of Yellowstone cutthroat, it contains the habitat conditions necessary to support a trout population. Due to lack of spawning habitat, however, this reach does not support any populations of wild trout. Because of these unique circumstances, stocking can be used to develop an urban stream trout fishery without the impacts typically associated with planting hatchery fish in streams. The state's hatchery program remains primarily focussed upon supporting fisheries in lakes and reservoirs where natural reproduction is limited.

Comment 11:
From a fisheries standpoint, the section of the Yellowstone River where the cutthroat would be planted is a transition zone between the prime trout river found further upstream and the warmwater section of the Yellowstone further downstream. Environmental conditions and fish populations in this section of river are, however, much closer to a trout stream than a warmwater stream. The fish species found in this section of the Yellowstone River (mountain whitefish, longnose dace, mountain suckers, white suckers, longnose suckers, and burbot) are the same species found in many of Montana's top trout streams. As indicated in the draft EA, mountain whitefish were the most abundant fish species found in this section of the Yellowstone River, and they appear to be thriving there.

Historically, this section of river and a significant portion of river downstream of the proposed stocking site supported a resident Yellowstone cutthroat trout population. It is very likely the proposed stocking section would continue to support a wild trout fishery of some kind, if there were enough young fish recruited to this section each year to maintain a population. As indicated in the draft EA, the main factor limiting trout recruitment to this section of river is the lack of usable spawning habitat in the area. The objective of this proposed project is to overcome this recruitment barrier through stocking to maintain a trout population as part of the natural fish assemblage that should be present in this section of river.

Water temperatures in this section of the Yellowstone River are more suitable for trout than

temperatures found in Montana's blue-ribbon lower Madison River. Thermograph records collected by the United States Geological Survey and the City of Billings from 1934 to 1965 show that mid-summer water temperatures in the center of the proposed release section usually range between 60° and 70° F. Rarely did water temperatures reach 75° F, and the maximum water temperature recorded during this 31 year period was 80° F recorded on July 24, 1955 (Aagaard, F. 1969, Temperatures of Surface Waters in Montana, USGS and Montana Fish and Game Commission). Low water temperatures are probably a major factor limiting the presence of channel catfish, sauger, and other warmwater fish species in this section of river.

Comment 12:
This comment referring to past studies was based on information from a complex paper that discussed Wyoming's assessment of their program for stocking trout in streams and lakes. This study evaluated the stocking of 8.9 million trout from 11 different hatcheries into numerous waters between 1987 and 1990. Many of these fish were planted into streams with poor habitat, a poor food supply, competition with other species, or other factors that could impact stocking success. The paper states that subcatchable trout should only be stocked into streams in the spring and only when the hatchery and receiving waters are similar in quality, water temperatures and flows are not limiting, and few competing fish are present. All of these conditions would be met in the proposed plant. Although this paper evaluated many different stream plants, the varying success rates were not broken out by strains of fish used. The authors did not distinguish whether they were using wild strains, domestic strains or a combination, which could affect stocking success rates. The cutthroat plant proposed in this program would be using a wild, fluvial strain of trout which has evolved in the upper end of the Yellowstone Drainage. Use of these wild fish should insure the best chances of success for this stocking program.

Comment 13:
Habitat protection and enhancement is the first goal identified in Montana's strategic plan for fisheries, Fisheries Beyond 2000, and is the cornerstone of Montana's fisheries program. Although habitat enhancement is not part of this proposal, it continues to be an important part of our fisheries program for the Yellowstone River.

Establishment of a trout fishery in the Yellowstone River near Billings could play an important role in gaining public support for habitat work in the future. As a fishery is developed, recreational use will increase along the river, which will increase interest in and support for the river. Several of the people who called in to support this EA wanted to know how they could get involved and actually help with the proposed project. One landowner who lives along a tributary stream just downstream of Billings wanted to know what he could do there to help cutthroat trout.

Comment 14:
According to Daryl Hodges, Big Timber trout hatchery manager, the McBride strain of Yellowstone cutthroat trout is a fluvial population that moves freely between McBride Lake, Slough Creek and the Lamar River system. The brood stock in the hatchery is maintained under stringent genetic control. New fish are continually brought in from the wild to maintain the wild, fluvial quality of these fish.

McBride cutthroat have evolved in the headwaters of the Yellowstone Drainage and are the best genetic source of Yellowstone cutthroat left for the Yellowstone River. It is impossible to determine if the McBride cutthroat are "genetically similar" to the original lower mainstem stock of Yellowstone cutthroat, because there are no fish left from this original stock. Thus far geneticists have been unable to distinguish any genetic differences among different populations of Yellowstone cutthroat.

Comment 15:
The draft EA proposes to stock native Yellowstone cutthroat trout back into a section of the Yellowstone River that was historic native range for these fish, but where they are no longer found. If this plan is successful, it will maintain a year-round, resident population of Yellowstone cutthroat in this section of river. Due to lack of recruitment, this population will be maintained through stocking. Some limited natural reproduction may be established in the future as habitat enhancement occurs. As natural reproduction develops, stocking rates could be adjusted to compensate, but it appears unlikely that natural recruitment will ever be a significant part of this fishery.

Comment 16:
Whirling disease was not specifically addressed in this EA because the fish used in this proposal will come from the Montana hatchery system. Whirling disease and all other disease issues will be addressed at the hatchery level before the fish are stocked into the river. Whirling disease has been discovered in the Yellowstone River since this project was first proposed, but this discovery should have little effect on this proposal. The cutthroat planted into the Yellowstone River near Billings would be large enough when stocked to avoid any serious impacts from whirling disease. Some of these fish could become infected with whirling disease, but consequences of this infection are likely to be minimal. The State will continue to monitor for whirling disease in the Yellowstone River, and some of the planted cutthroat may be included in this sampling in the future.

Comment 17:
One respondent felt that the cost of this project may outweigh the benefits while the second respondent felt that an in depth economic analysis would show a tremendous benefit to the public for the cost involved. An in depth economic analysis was not part of this EA. Because of the large population base in the vicinity of the project that could take advantage of this fishery and the relatively low cost of the proposed plants, it is likely the cost/benefit ratio of this project, if successful, would be very favorable.

Comment 18:
Concern was expressed that this proposal would violate Montana's ARM Rules regarding the stocking of catchable-size trout for immediate harvest. These rules do not apply to this proposal. This project is not a proposal to stock catchable-sized trout for immediate harvest, but a proposal to stock sub-catchable Yellowstone cutthroat trout into the Yellowstone River to develop and maintain a resident trout population in the river, and provide a put-grow-and-take fishery. ARM

Rule 12.7.601(7) states that the periodic planting of fish for population manipulation, rather than immediate harvest, is a type of resource management. This rule presented two main criteria that must be met for this type of resource management to continue:

a) The planted fish, after growing to the desired size for harvest, shall have measurably increased some segment of the fish population of the water planted.
b) The planted fish shall comprise a significant portion of the harvest from that water.

Both of these criteria should be easily met if this stocking program is successful. The section of the Yellowstone River that would be planted currently lacks any significant population of trout or other game fish, other than mountain whitefish. Establishment of a resident cutthroat population in this section of river would make a significant contribution to the current fish population that is present. It would add an important component to the assemblage of native fish that were historically found in this section of river.

Because this section of the Yellowstone River currently supports a very limited gamefish population, the actual harvest of fish by anglers is quite low. Establishment of a viable cutthroat fishery in this section of the river should significantly increase angler use, and thus harvest of fish. Most of this additional harvest would be Yellowstone cutthroat.

Monitoring of this fishery will be a vital component of the proposed project. Only when it is demonstrated that the stocked Yellowstone cutthroat remain within the Billings vicinity and contribute significantly to angler success, as outlined in the EA, will planting continue.